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HARRY A. GAVALAS (1978 - 1999)ROBERT J. SEMINARA (1987-1999)

April 8, 2008

BY HAND

The Honorable Loretta A. Preska United States District Judge Daniel P. Moynihan U.S. Courthouse 500 Pearl Street, Room 1320 New York, New York 10007

07 CIV 7762 (LAP) Our File No.: 1600.0001

Ocean Trade S.A., et al. v. Ziogas, et al. Re:

Dear Judge Preska:

We represent all Defendants in this matter and write, with the consent of counsel for Plaintiffs, to respectfully request an adjustment of the briefing schedule so as to allow up to and including April 23, 2008 to file Defendants' reply to Plaintiffs' opposition to Defendants' motion to dismiss. Defendants' reply submissions are currently due on April 14, 2008. This is Defendants' first request for an extension.

Defendants request this extension in order to allow for translation of documents from foreign court proceedings. Additionally, Defendants' reply submissions are likely to include affidavits and/or declarations from several overseas witnesses.

For these reasons, Defendants respectfully request that the Court extend Defendants' time to submit their reply submissions up to and including April 23, 2008.

april 11,2008

UNITED STATES DISTRICT JUDGE

BROWN GAVALAS & FROMM LLP

The Honorable Loretta A. Preska April 8, 2008 Page 2

We thank the Court for its consideration of this matter.

Respectfully submitted,

BROWN GAVALAS & FROMM LLP

Peter Skoufalos

cc: Freehill, Hogan & Mahar LLP

Attorneys for Plaintiffs

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